

licensed attorney.”). Courts within the Fourth Circuit have held that trusts, as entities, cannot proceed *pro se*.³ Basira Na’Imah Bey Express Tr. v. Carrington Mortg. Servs., LLC, No. 1:22-CV-1020, 2023 WL 4868083, at *2 (M.D.N.C. July 31, 2023) (collecting cases).

Plaintiff therefore cannot pursue this action without legal counsel. Accordingly, Plaintiff must obtain legal counsel before the Court can consider the Motion for Preliminary Injunction.


Furthermore, although the Court liberally construes *pro se* pleadings, it appears that Plaintiff’s case lacks merit. Indeed, Plaintiff’s filings seem to draw on sovereign citizen theories of law, which are frivolous. United States v. White, 480 F. App’x 193, 195 (4th Cir. 2012).


IT IS THEREFORE ORDERED that:

1. Plaintiff’s Motion for Preliminary Injunction, (Doc. No. 3), is **DENIED** without prejudice.
2. Plaintiff is **DIRECTED** to obtain legal counsel within 30 days. Plaintiff’s counsel must enter a Notice of Appearance in this matter within 30 days of this Order. Should Plaintiff fail to obtain legal counsel, this matter will be dismissed without further notice.

IT IS SO ORDERED.

Signed: November 21, 2024


Frank D. Whitney
United States District Judge



³ Five Circuit Courts also extend “artificial entities” to include trusts and prohibit non-attorney trustees from representing a Trust *pro se*. See, e.g., J.J. Rissell, Allentown, PA Trust v. Marchelos, 976 F.3d 1233, 1236 (11th Cir. 2020), United States v. Lain, 773 F. App’x 476, 477 (Mem) (10th Cir. 2019), Van De Berg v. C.I.R., 175 F. App’x 539, 541 (3d Cir. 2006), Hale Joy Trust v. C.I.R., 57 F. App’x 323, 324 (9th Cir. 2003), Knoefler v. United Bank of Bismarck, 20 F.3d 347, 348 (8th Cir. 1994).